



October 31, 2014

Ms. Chris Jump
U.S. Environmental Protection Agency
Region VII
901 North 5th Street
Kansas City, Kansas 66101

**RE: Third Quarter 2014 Progress Report
Clean Harbors Kansas, LLC
2549 New York Street, Wichita, Kansas
EPA Identification No: KSD007246846**

Dear Ms. Jump;

As required by the Clean Harbors Kansas, LLC HSWA, Part II RCRA Permit, Conditions III.S.1. – 6., Clean Harbors Kansas, LLC (Clean Harbors) is providing this quarterly summary progress report covering activities that occurred during the Third Quarter 2014. The activities summarized in this report have been conducted pursuant to the corrective action provisions of Permit Condition III. This progress report contains information to comply with following permit conditions:

- III.S.1. A description of all work completed during Third Quarter 2014.
- III.S.2. A summary of all findings, including summaries of laboratory data.
- III.S.3. A summary of all problems or potential problems encountered during the reporting period.
- III.S.4. Deviations from the approved work plan(s), SAP's.
- III.S.5. Projected work for the Fourth Quarter 2014 and,
- III.S.6. Any instances of noncompliance with the Part II Permit not otherwise required to be reported pursuant to Part II Permit Conditions II.E.11 and II.E.16.

III.S.1 During the Third Quarter 2014 the following work was completed at the Clean Harbors Kansas Facility.

Clean Harbors submitted a response to agency comments on the IRM workplan on July 2, 2014. Workplan approval was received from the EPA on July 31, 2014.

Clean Harbors submitted an addendum to the Quality Assurance Project Plan (QAPP) on July 8, 2014. This addendum was approved by EPA on July 8 2014. A second QAPP addendum was submitted on July 21 and approved on August 19,





2014. Both of these amendments were submitted to include the QAPPs of laboratories that were not included in the original QAPP submittal.

The DRAFT Phase IV RCRA Facility Investigation Report was submitted to EPA and KDHE for review on August 15, 2014.

Clean Harbors submitted a semi-annual groundwater monitoring report documenting the results of the April 2014 groundwater sampling event in September 2014. Clean Harbors requested and was granted permission to suspend groundwater monitoring activities at the Site until the IRM activities are completed (expected late 2014).

Excavation of the Phase I areas described in the IRM work plan was completed during the third quarter. Excavation of Phase II areas was initiated in late September. Confirmation sampling results from excavations completed during the third quarter were transmitted to EPA via email throughout the quarter.

Final Rinsate data for Buildings B, D and the Processing Area were transmitted to EPA and KDHE during the third quarter.

An asbestos survey for Buildings B, D and the Processing Area was completed to satisfy KDHE demolition requirements. This survey identified limited areas with asbestos containing materials. These materials were subsequently removed by a licensed asbestos abatement contractor.

III.S.2. A summary of all findings, including summaries of laboratory data.

Confirmatory soil sample results have been transmitted to EPA for review throughout the quarter. The dimensions of the Phase I excavations closely resembled those depicted in the IRM work plan with the exception of Building J. The building J excavation included the majority of the floor of the building to a depth of 12 feet bgs. Soil containing concentrations of COCs exceeding IAOs was left in place in portions of Building J and the west of Building I excavation. This material could not be safely excavated due to the overlying building foundation.

Rinsate data for Buildings B, D and the Processing Area were submitted to EPA and KDHE for review through the quarter. Rinsate submittals were discussed with EPA and KDHE on a conference call on August 19, 2014.



III.S.3. A summary of all problems or potential problems encountered during the reporting period.

At the conclusion of Phase I, the project experienced an approximately two week delay due to the availability of trucks to transport excavated soil. No other problems were encountered.

III.S.4. Deviations from the approved work plan(s), SAP's

Excavation of all soil with COC concentrations exceeding IAOs was not possible in the west of Building I excavation due to proximity to the building footer.

III.S.5. Projected Work for the Third Quarter 2014:

Decontamination of Building C will be performed during the fourth quarter. Demolition of Buildings B, C, D and the process area will be completed. All IRM activities are expected to be completed during the fourth quarter.

Confirmatory soil sampling results will continue to be forwarded to EPA for review as soon as possible once the excavations are completed.

III.S.6. Any instances of noncompliance with the Part II Permit not otherwise required to be reported pursuant to Part II Permit Conditions II.E.11 and II.E.16.

No instances of non-compliance were reported or encountered during the reporting period.

Please do not hesitate to contact me with any questions regarding this report. I can be reached at 510-777-1864 (e-mail: mstephenson@cameron-cole.com).

Sincerely,

Mike Stephenson
Principal Scientist

cc: John Cook, KDHE
Akhter Hossain, KDHE
Mustafa Kamal, KDHE
John Martin, Clean Harbors Kansas, LLC



Martin Smith, Clean Harbors
Lon Stewart, Clean Harbors